

# Exhibit 569

## CERTIFIED TRANSLATION



STATSADVOKATEN

The Danish Tax Agency

Date: 6 January 2021

J.nr.: SØK-10177-00037-19

Case Handler: SWI

THE PUBLIC PROSECUTOR FOR  
SPECIAL ECONOMIC AND  
INTERNATIONAL CRIMES

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## Request for Information regarding the Danish Tax Agency's Settlement

In a letter dated 24 August 2015, SKAT (now the Danish Tax Agency), reported suspected fraud committed against SKAT in the period 2012 to 2015, whereby SKAT suffered a total loss of approximately DKK 12.7 billion. The cases are being investigated by The Public Prosecutor for Special Economic and International Crimes (SØIK).

As disclosed by the Danish Tax Agency to SØIK, in May 2019 the Danish Tax Agency entered into a settlement with 61 US pension plans and a number of related individuals and companies in part of the overall case complex. According to the information provided, the settlement agreement means that the 61 pension plans and others must pay an amount of DKK 1.6 billion to the Danish state.

For the purpose of the further investigation, SØIK would like to request answers to the following questions:

1. Which natural or legal persons has the Danish Tax Agency entered into the referenced settlement with?
2. Which refunds are covered by the settlement (for example by indication of SKAT's batch number)?
3. How is the settlement sum composed (does it include for example compensation of expenses other than the received dividend refunds)?

4. How much of the total settlement sum of DKK 1.6 billion has been paid to the Danish Tax Agency, and when does the remaining amount fall due for payment?
5. Which claims are the payments reduced against?
6. Are claims beyond the settlement amount waived, and if so in what manner?
7. Is the settlement an expression of a final decision in the civil case, or will further compensation claims against the settlement parties arise later?
8. Has the Danish Tax Agency been provided with security for fulfillment of the settlement, including guarantees, security or the like? In such event, has the Danish Tax Agency undertaken any form of perfection in this regard?
9. Does the Danish Tax Agency still have a compensation claim in the case, and if so, against whom and for what amount?

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In addition, SØIK kindly requests information about what, if any, confidentiality clauses have been agreed to in the settlement.

SØIK asks to receive the Danish Tax Agency's response as soon as possible, and preferably no later than January 15, 2021.

If the Danish Tax Agency has questions regarding this request, inquiries can be directed to the Special Prosecutor Stine Winther, tel. 61 126979 or via email: [swi007@politi.dk](mailto:swi007@politi.dk).

With best regards

Malene Stage Christensen

Deputy Prosecutor, acting.



**STATSADVOKATEN**

Skattestyrelsen

Dato: 6. januar 2021

J.nr.: SØK-10177-00037-19

Sagsbehandler: SWI

STATSADVOKATEN FOR SÆRLIG  
ØKONOMISK OG INTERNATIONAL  
KRIMINALITET

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### **Anmodning om oplysninger vedr. Skattestyrelsens forlig**

SKAT (nu Skattestyrelsen) har bl.a. ved brev af 24. august 2015 anmeldt formodet bedrageri begået over for SKAT i perioden 2012 til 2015, hvorved SKAT led et samlet tab på ca. 12,7 mia. kr. Sagerne efterforskes af Statsadvokaten for Særlig Økonomisk og International Kriminalitet (SØK).

Som oplyst af Skattestyrelsen overfor SØK indgik Skattestyrelsen i maj 2019 et forlig med 61 amerikanske pensionsplaner og en række dertil knyttede personer og selskaber i en del af det samlede sagskompleks. Forligsaftalen går efter det oplyste ud på, at de 61 pensionsplaner m.fl. skal betale et beløb på 1,6 mia. kr. til den danske stat.

Til brug for den videre efterforskning skal SØK venligst anmode om svar på følgende spørgsmål:

1. Hvilke fysiske og juridiske personer har Skattestyrelsen indgået det omhandlende forlig med?
2. Hvilke refusioner er omfattet af forliget (eksempelvis ved angivelse af SKAT's bundtnumre)?
3. Hvordan er forligssummen sammensat (indgår der eksempelvis erstatning af andre udgifter end den modtagne udbytterefusion)?

4. Hvor stor en andel af den samlede forligssum på 1,6 mia. kr. er indbetalt til Skattestyrelsen, og hvornår er det resterende beløb forfaldent til betaling?
5. Hvilke fordringer er indbetalingerne afskrevet på?
6. Er fordringer ud over forligsbeløbet eftergivet, og i så fald på hvilken måde?
7. Er forliget et udtryk for en endelig afgørelse af den civile sag, eller vil der senere kunne opstå yderligere erstatningskrav rettet mod forligsparterne?
8. Har Skattestyrelsen modtaget sikkerhed for opfyldelse af forliget, herunder garantier, pant eller lignende? Har Skattestyrelsen i givet fald foretaget nogen form for sikringsakt i den forbindelse?
9. Har Skattestyrelsen fortsat et erstatningskrav i sagen, og i så fald mod hvem og med hvilke beløb?

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ØKONOMISK OG INTERNATIONAL  
KRIMINALITET

Endvidere skal SØIK venligst anmode om oplysning om hvilke eventuelle tavshedsklausuler, der er aftalt i forliget. SIDE 2

SØIK anmoder om at modtage Skattestyrelsens svar snarest muligt, og meget gerne senest den 15. januar 2021.

Såfremt Skattestyrelsen har spørgsmål til denne anmodning, kan henvendelse rettes til specialanklager Stine Winther, tlf. 61126979 eller via e-mail: swi007@politi.dk).

Med venlig hilsen

Malene Stage Christensen  
vicestatsadvokat, fg.

I, the undersigned, Julius Holm Nørremark, certify that I am fluent in both the English and Danish languages and that the preceding text in the English language is to the best of my knowledge and belief a true and faithful translation of the attached exhibit, with the bates stamp SKAT\_MAPLEPOINT\_00000310, in the Danish language.

Copenhagen, 7 April 2025

A handwritten signature in black ink, reading "Julius Holm Nørremark". The signature is written in a cursive style with a large initial 'J'.

Assistant Attorney, LL.M.